

ADEM**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

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February 28, 2003

OSWER Docket
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ATTN: Docket ID No. RCRA-2002-2003

Dear Sir/Madam:

The Alabama Department of Environmental Management has reviewed EPA's *Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway (sic) from Groundwater and Soils*. ADEM has provided regulatory oversight of one site in Alabama that has addressed the vapor intrusion issue very recently. For this project (the Coliseum Blvd Plume Site), vapor intrusion sampling is being implemented in a tiered process. The process is not yet complete. The overall approach thus far compares reasonably well with EPA's *Draft Guidance*, but because site investigation work is continuing at this time, a complete historical comparison is not yet available and ADEM's comments are limited to the following points.

1. Page D-2, Section 3, Data Sources, Toxicity Values: The extrapolation of inhalation values from ingestion values is questionable. Furthermore, the target levels are quite low such that a qualified laboratory may have difficulty achieving the necessary method detection limit, at least in a manner that produces a consistent or repeatable data set. EPA should confirm the reliability of a detection limit lower than 1 ug per cubic meter.
2. Page E-7, Measurement of VOCs in the Sub-Slab Soil Gas: Sub-slab sampling in the guidance document calls for the drilling of small diameter holes in the slab. Drilling holes in a residential slab will entail displacing flooring, such as carpets, tile or linoleum. Intrusive sampling of this kind may not be appropriate or warranted, except in unusual circumstances. Compromising the flooring could open a potential pathway for soil vapors, termites and sub-slab moisture. Homeowners may take issue with a regulatory agency's request to drill holes in residence floors. For the Coliseum Blvd Plume site, ADEM approved the insertion of soil vapor probes under home slabs at an angle to avoid compromising the slab.

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